

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Regina Pickett

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NOV - 2 2023

AT 8:30                      M  
CLERK, U.S. DISTRICT COURT - DNJ

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Office of Legislative  
Services

COMPLAINT

Jury Trial: ☒ Yes ☐ No  
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff      Name  
                    Street Address  
                    County, City  
                    State & Zip Code  
                    Telephone Number

Regina Pickett  
300 Sewell Ave  
Mercer, Trenton  
New Jersey 08610  
609-954-4055

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Office of Legislative Services  
 Street Address 145 W. State St.  
 County, City Mercer, Trenton  
 State & Zip Code New Jersey 08625

Defendant No. 2

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions ☐ Diversity of Citizenship  
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

SEE ATTACHED

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? SEE ATTACHED

B. What date and approximate time did the events giving rise to your claim(s) occur? \_\_\_\_\_

See ATTACHED

C. Facts: \_\_\_\_\_

See ATTACHED

What  
happened  
to you?

Who did  
what?

Was  
anyone  
else  
involved?

Who else  
saw what  
happened?

See ATTACHED

**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

See Attached

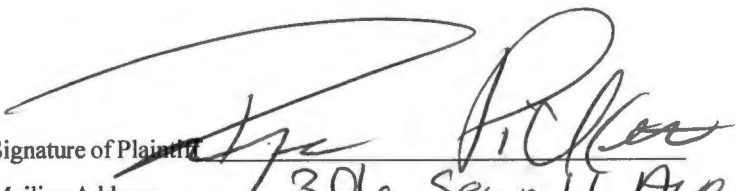
**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

See Attached

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 2 day of November, 2023

Signature of Plaintiff 

Mailing Address

306 Sewall Ave  
Trenton, N.J.  
08610

Telephone Number

609-954-4055

Fax Number (if you have one)

E-mail Address

GINAGE66@GMAIL.COM

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff 

CERTIFICATION OF SERVICE

I, Regina P. Kett, certify that a copy of my motion was served  
(Name of Moving Party)  
by mail on November 2, 2023 upon:  
(Mail, Personal Service, etc.) (Date)

RECEIVED

NOV - 2 2023

Achchana Ranasinghe AT 8:30 M  
(Name of Opposing Party) CLERK, U.S. DISTRICT COURT - DN.

Office of the Attorney General

Division of Law

P.O. Box 112 Richard J. Hughes Justice Complex  
(Address of Opposing Party) Trenton, N.J. 08625-0117

[Signature]  
Name (Signature)

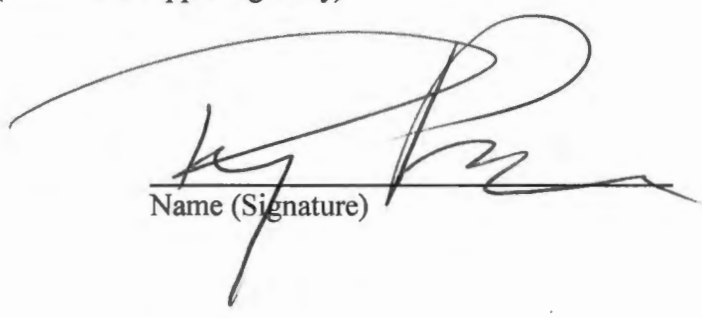
CERTIFICATION OF SERVICE

I, Regina Pickett, certify that a copy of my motion was served  
(Name of Moving Party)  
by Certified Mail on November 2, 2023 upon:  
(Mail, Personal Service, etc.) (Date)

Roger Lai  
(Name of Opposing Party)

P.O. Box 68 State House Annex Room 210  
1 Renton, WA 98025

(Address of Opposing Party)

  
Name (Signature)



1 Roger Lai  
2 PO BOX 68 STATE HOUSE ANNEX, ROOM 210  
3 Trenton, NJ 08625

4 ACHCHANA RANASINGHE  
5 OFFICE OF THE ATTORNEY GENERAL, DIVISION OF LAW  
6 PO BOX 112 RICHARD J HUGHES JUSTICE COMPLEX  
7 TRENTON, NEW JERSEY 08625-0117

8  
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEW JERSEY**

11 **REGINA PICKETT,**

12 **Plaintiff,**

13 **vs.**

14 **OFFICE OF LEGISLATIVE SERVICES,**

15 **Defendant**

Case No.: Number

PLEADING TITLE

16 Plaintiff, Regina Pickett, by way of Complaint against Defendants, avers:

17  
18 1. Plaintiff, Regina Pickett, is an individual residing at, 306 SEWELL  
19 AVENUE, Trenton, New Jersey 08610.

20  
21 2. Defendant, Office of Legislative Services, is an agency of the Legislative  
22 Branch of the State Government of New Jersey that is governed by the New Jersey  
23 Legislative Services Commission, located at 145 West State Street Trenton, NJ 08625.

24  
25 3. On July 20, 1987, Plaintiff, Regina Pickett began employment with the  
26 Office of Legislative Services. Nicholas Behmke began his employment as director of  
27



1 Data Management Unit with the Office of Legislative Services, in August 2018. The unit  
2 was renamed to Information Technology Unit in 2019.

3  
4 4. In March of 2021, Nicholas Behmke in collaboration with Human  
5 Resource Director (Christin Knox) came together to implement a policy directly used to  
6 discriminate against me. Throughout the year of 2021 into 2022, disparate treatment  
7 ensued.  
8

9  
10 Plaintiff brings this action under Title VII of the Civil Rights Act of 1964  
11 (42 U.S.C. § 2000e et seq.) Racial discrimination in the workplace by implementing a  
12 policy that enabled bias and unequal treatment. For this Complaint alleges:  
13

14  
15 5. On March 19, 2020, the Office of Legislative Services transitioned to  
16 remote work due to the COVID-19 pandemic. On July 20, 2020, Peri  
17 Horowitz, the Executive Director, and Christian Knox, the HR Director,  
18 created a hybrid onsite and remote work arrangement for the Office of  
19 Legislative Services (OLS) employees. The policy included a provision  
20 stating that employees with high-risk medical conditions could continue  
21 to work remote as directed by a medical professional if supported with  
22 documentation.  
23

24  
25 6. On July 14, 2020, per my doctor's recommendation, I submitted  
26 documentation to continue working remote. I received written approval  
27  
28

1 from Human Resources on July 30, 2020, to continue remote work until  
2 January 14, 2021.

3  
4 7. On January 4, 2021, I submitted updated documentation to continue  
5 working remote (as the pandemic was still in full swing) and I obtained  
6 approval to continue remote work until June 18, 2021.

7  
8 8. On March 1, 2021, I received an email from Christian Knox, inquiring  
9 of my availability to attend a zoom call to which I inquired about the  
10 basis of the meeting and did not receive correspondence. Christian Knox  
11 scheduled the zoom call for March 3, 2021. Attendees were myself, my  
12 director Nicholas Behmke, and Christin Knox. During this meeting, the  
13 defendants informed me that OLS would no longer support a COVID-  
14 19 telework accommodation for Network Engineers to work remote,  
15 due to an underlying health condition or dependent care. Several  
16 instances of bias and unequal treatment began once I returned to the  
17 workplace on March 22, 2021, which raised concerns.

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20 9. On March 30, 2021, Krista LaBoy, a Caucasian Network Engineer,  
21 requested to work remote for dependent care on April 1, 2021, and  
22 received approval from Mitchell Blustein. Similarly, Charles Green, a  
23 Caucasian Network Engineer, requested and received approval to work  
24 remote for the week of May 3, 2021. In contrast, I requested to work  
25 remote May 13, 14, and 17-19, 2021 for quarantine purposes and was  
26  
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28

1 denied by Christin and Nicholas, and was instructed to use my paid time  
2 off (PTO). I became aware that on May 18, 2021, Nicholas made a  
3 written statement (via email Re: subject Regina) to Joseph Petrino, "***I***  
4 ***make a point to make her use her own time***", and Petrino responded,  
5 ***"Good!"*** On this instance where I was denied remote work, Mitchell  
6 Blustein, James Fasoli, and Nicholas sent out electronic communication  
7 to all members of the networking group that there would be no remote  
8 work for all those that report to Mitchell Blustein. Nicholas forwarded  
9 correspondence to Mitchell stating ***"Agreed. Head off the Regina***  
10 ***question ahead of time***". These apparent disparities in treatment  
11 coupled with the collaboration within the Information Technology Unit  
12 leadership team, statements made by Nicholas, along with the sudden  
13 change in the remote work policy for network engineers, exhibits overt  
14 discrimination.

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19 10. In May of 2021, I experienced a significant change in my daily job  
20 duties demoting my role from a *Network Engineer* to that of a *Network*  
21 *Technician*. It is important to note that no other Network Engineers  
22 were required to perform any of the following tasks whether onsite or  
23 off-site, summing up the role of a Network Technician. This was a clear  
24 demotion in tasks, and I was now required to physically load and unload  
25 vans with computer equipment, monitors, keyboards, and PC's.  
26  
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1           Additionally, I was now required to travel to various legislative offices  
2           to disconnect, move, reconnect computer equipment, and printers,  
3           increasing exposure and risks of contracting COVID-19. This affected  
4           my mental state significantly, causing increased anxiety, and physical  
5           pain with the constant loading, lifting and moving of computer  
6           equipment.  
7

8  
9           11. Effective October 25, 2021, OLS required all employees to provide  
10           proof of full vaccination against Covid-19 or if unvaccinated,  
11           employees were to submit weekly results of a negative COVID-19 PCR  
12           test to Human Resources no later than 10:00 am, of the first day of the  
13           workweek to gain entry into the workplace. Employees who did not  
14           submit test results, were not permitted on-site, had to use accumulated  
15           leave, and would not be permitted to work remote. On December 28,  
16           2021, Charles Green did not want to use his (PTO). While awaiting his  
17           Covid-19 test results Charles Green asked Nicholas Behmke if he could  
18           work remote and his request was granted. Similarly, I (the plaintiff)  
19           requested the same accommodations a week later on January 3, 2022,  
20           (as the lab was backlogged on getting out test results) via email to  
21           Christin Knox, and I received correspondence from Carly Diaz in  
22           Human Resources stating that I would need to use my own leave time. I  
23           responded protesting to her that I was aware others had been allowed to  
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1 work remote while waiting for their test results. On January 4, 2022, I  
2 emailed defendants, (Nicholas Behmke) and (Mitchell Blustein) asking  
3 if I could work remote while waiting for my test results and Nicholas  
4 Behmke denied my request and directed me to Human Resources to  
5 which I had already received their denial.  
6

7  
8 12. Nicholas B. and Mitchell B consciously knowing they were facilitating  
9 and perpetuating acts of blatant maltreatment, have shown a limp  
10 pattern of bias behavior and practices of continuous discrimination,  
11 which created an extremely hostile work environment. Colleagues have  
12 received directives not to share project information with me and my  
13 supervisor Mitchell informed me that I was not to ask any of my  
14 colleague's questions about any work projects, and to direct all of my  
15 questions to him only.  
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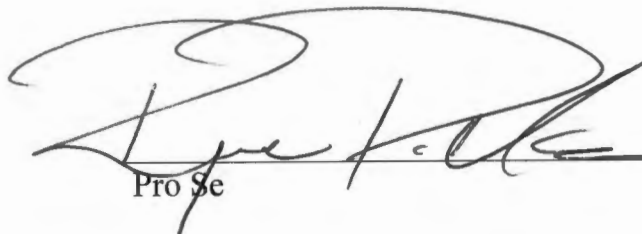
18 13. As a result of being subjected to their behavior I have experienced  
19 emotional distress in the form of anxiety, emotional trauma, irritation,  
20 indignation, and resentment all contributing to psychological stress as  
21 the defendant was deliberate in having me travel to other legislative  
22 offices increasing vulnerability to health risks, chances of contracting  
23 the coronavirus, and ultimately increasing likeliness of possible death. I  
24 would also like to mention that defendants were aware that I had lost my  
25 father and other family members amid experiencing these changes and  
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1 challenges. I have experienced defendants' verbal response of, "*you*  
2 *people always asking for time off or to leave early*". Enduring  
3 humiliation by the demotion in my daily work duties, the stress, and  
4 mental anguish, impelled me to seek professional treatment. This bias  
5 treatment negatively affected my work environment, productivity and  
6 the interaction between my longtime colleagues and supervisors.  
7

8  
9 Wherefore, Plaintiff requests that the Court:

- 10
- Reinstatement all PTO time used and add seven additional sick days.
  - Mandate all staff attend New Jersey Division of Civil Rights bias  
11 training.
  - Monetary relief for the amount of \$150,000.00 due to the emotional  
12 distress and harms inflicted throughout the entirety of this  
13 unfortunate experience. This amount covers a range of harms not  
14 exhaustive, but includes anxiety, sleeplessness, loss of enjoyment of  
15 professional environment, reputational harm, strained relationships  
16 with family members, friends and colleagues, all court cost, fees  
17 incurred, and any additional relief as determined by the Court.  
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Pro Se